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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF THE
PARTIES' REVISED JOINT CASE
MANAGEMENT STATEMENT**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal Portions of the Parties’ Revised Joint Case Management Statement, filed concurrently herewith
8 (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following
9 materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Statement	Highlighted Portions	Waymo (green highlighting)

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13 3. Specifically, the parties’ Revised Joint Case Management Statement (“the “Statement”)
14 contains or refers to trade secret and confidential business information, which Waymo seeks to seal.

15 4. Portions of the parties’ Statement (portions highlighted in green) contain, reference,
16 and/or describe Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the
17 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, which
18 Waymo maintains as secret. I understand that these trade secrets are maintained as secret by Waymo
19 (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31). The public
20 disclosure of this information would give Waymo’s competitors access to in-depth descriptions—and
21 analysis—of the functionality of Waymo’s autonomous vehicle system. If such information were
22 made public, I understand that Waymo’s competitive standing would be significantly harmed.

23 5. Waymo’s request to seal is narrowly tailored to those portions of the Statement that
24 merit sealing, and the scope of information that Waymo is seeking to seal is consistent with other
25 administrative motions to seal that have already been granted by the Court in this case. (*See* Dkt. 416,
26 414, 406, 393, 392.)
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28

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on June 1, 2017.

4 By /s/ Lindsay Cooper
5 Lindsay Cooper
6 Attorneys for WAYMO LLC
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8

9 **SIGNATURE ATTESTATION**

10 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
11 filing of this document has been obtained from Lindsay Cooper.

12 /s/ Charles K. Verhoeven
13 Charles K. Verhoeven
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